

New Law Changes for License Requirements Effective January 1, 2022

Pursuant to SB 806, Chapter 649 signed by the Governor October 7, 2020, the following changes go into effect January 1, 2022.

Changes to Physician and Surgeon Licensure Eligibility

- After January 1, 2022, residents are eligible to apply for a Physician and Surgeon license after completing 12 month of postgraduate training credit.
- Those holding a full, unrestricted license in another state are exempt from these changes. There is no change to those fully licensed in another state applying for full licensure in California. They are licensed pursuant to reciprocity eligibility that only requires completion of 12 months of postgraduate training.
- After January 1, 2022, those licensed with a Physician and Surgeon license that are not otherwise fully licensed in another state are required to complete 36 months of postgraduate training credit in order to retain their Physician and Surgeon license.
- The requirement for licensure of completing 36 months, 24 months of which must be in the same training program has not changed. What has changed is when that requirement must be met—prior to licensure or as a condition of renewal.

Continuing Medical Education Changes

Effective January 1, 2022, the law changed the amount of CME hours required to be reported and the time in which CME must be obtained.

The pertinent changes made by SB 806 are the following:

1. The amount of CME required for a two-year reporting period is now a total of 50 hours, with a minimum of 20 hours in AOA category 1A or 1B.
2. The 2-year reporting period is now based on your license expiration date. In other words, CME should be obtained after the expiration date of your last renewal but before the expiration date of your next renewal. This makes the CME reporting period identical to your license renewal period.

Therefore, all licensees renewing their licenses after January 1, 2022 will need to report a total of 50 hours of CME, with a minimum of 20 hours of AOA category 1A or 1B credit, obtained after the expiration date of their last renewal but before the expiration date of their next renewal. For example, if your license is due for renewal by June 30, 2022, you would need to report a total of 50 hours of CME obtained between 6/30/2020 and 6/30/2022. CME is not required for holders of a Postgraduate Training License. CME requirements apply only to those

licensed as a Physician and Surgeon. For those in residency, proof of residency can be reported as CME.

Completion of 36 months of Postgraduate Training Is Required to Retain Physician and Surgeon License

The requirement of completing 36 months, 24 months of which must be in the same training program, has not changed. What has changed is when that requirement must be met. For those licensed with a postgraduate training license prior to January 1, 2022, they have the option of waiting until they complete their 36 months of postgraduate training before applying for a Physician and Surgeon license; or, they can apply for a Physician and Surgeon license prior to completing 36 months of postgraduate training and then be required to demonstrate completion of the 36 months at their first or second renewal in order to retain their license.

Currently, the Physician and Surgeon licenses are issued based on birth month and the first cycle is a short cycle to bridge the gap from the date licensed to your birth month. The first license fee is prorated because in most cases the license duration is less than two years. The second renewal and all future renewals are a two year cycle that begins and ends on your birth month. As a result, those who may be up for their first renewal may not have completed their 36 months of postgraduate training so they will have to demonstrate completion upon their second renewal. This will not change and will remain in effect after January 1, 2022.

For those licensed as a Physician and Surgeon after January 1, 2022, the timing of demonstrating compliance with this requirement at your first or second renewal depends on whether you have completed your 36 months of training by the time of your first renewal. Those who have completed the 36 months of postgraduate training by their first renewal, will have to demonstrate completion of 36 months of postgraduate training in order to have their license renewed by the Board. Those who have not completed 36 months of postgraduate training at the time of their first renewal will have to demonstrate completion at their second renewal in order to have their license renewed.

At the conclusion of completing 36 months of postgraduate training, 24 months of which in the same training program, applicants must request that your training program(s) submit another Form OMB.25 certifying completion of 36 months of postgraduate training. If you fail to demonstrate completion of 36 months of postgraduate training, 24 months of which in the same program by the date your license expires, your license will become delinquent and remain delinquent until such time as the Board receives a completed OMB.25 form and issues the renewal of your license. **If your license expires, you will have to cease practice immediately within your residency.**

Changes to Postgraduate Training License

- The expiration date for those licensed after January 1, 2022 changed from 36 months plus 90 day grace period (39 months) to 12 months plus a 90 day grace period (15 months).
- This new shortened license expiration is designed around the new 12 month eligibility for a Physician and Surgeon license.
- Those who fail to obtain their Physician and Surgeon license prior to the expiration of their Postgraduate Training License, will have to cease practice immediately and will not be able to continue in their residency program until such time as they are licensed as a Physician and Surgeon.
- Those licensed prior to January 1, 2022 will have 39 months before their Postgraduate Training License expires. They will have to demonstrate completion of 36 months of postgraduate training credit either prior to being licensed as a Physician and Surgeon or at their renewal if they opt to apply for a Physician and Surgeon license prior to completing 36 months of postgraduate training credit.

SB 806 did not change the requirements for obtaining a PTL. Residents must still be issued a PTL within 180 days from enrollment in a California ACGME-accredited program. While SB 806 does not impact eligibility for a PTL, it may impact a PTL expiration date, once issued. Up until December 31, 2021, PTLs may be issued up to 39 months. PTLs issued prior to January 1, 2022, will maintain their original expiration date, even if it extends beyond 15 months, as long as the PTL holder maintains enrollment in a California ACGME-accredited program.

Board Automation of Fingerprint Fees and Processing Finger Prints

- Effective January 1, 2022, the Board will no longer charge the \$49 finger print fees with license applications. Applicants will pay finger print fees for DOJ processing to the vendor.
- Finger print cards should be sent to the Department of Justice not the Board for processing.
- Out of State Applicants who are required to use finger print cards, should still request finger print cards from the Board to ensure results are provided to the Board. Cards should be sent to the following address:

**California Department of Justice
P.O. Box 903417
Sacramento, CA 94203-4170**

- New revised Live scan forms can be downloaded from the Board's website. One of the three required copies must be sent to the Board. This is unchanged.

- The vendor will charge their finger print fee plus the \$49 DOJ processing fee.
- Applicants will only pay the Board the license application fee. The Postgraduate Training License application fee is \$491. The Physician and Surgeon License application fee is \$200.
- The requirement that applicants for licensure get finger print clearance is unchanged and remains a licensure requirement.

To locate a Live Scan site near you, visit <https://oag.ca.gov/fingerprints/locations>. Hours of operation and rolling fees vary by location, so please contact the Live Scan site directly for information.

Please contact the DOJ at appagencyquestions@doj.ca.gov after submitting the fingerprint cards to inquire about the status of the results. **Please note results from the manual process can take up to 16 weeks.**

Note: For training programs reimbursing residents for application and license fees, they will have to reimburse the resident directly for the \$49 finger print fee based on a receipt from the vendor, not the Board. The finger print fee will no longer be part of the application fee for either the Postgraduate Training License or the Physician and Surgeon License.

All Forms and Applications can be downloaded from the Board's website at www.ombc.ca.gov

If you have any questions or concerns regarding this notice, please contact licensing department at Osteopathic@dca.ca.gov.